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10 *Attorney for Defendant, Bank of America, N.A.*

7 **THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 VERONICA PADILLA,

10 Plaintiff,

11 v.

12 BANK OF AMERICA, N.A. and TRANS
13 UNION LLC,

14 Defendant.
15

Case No. 2:23-cv-01760-GMN-DJA

**JOINT STIPULATION FOR EXTENSION
OF TIME FOR BANK OF AMERICA, N.A.
TO RESPOND TO PLAINTIFF'S
COMPLAINT [FIRST REQUEST]**

16
17 **JOINT STIPULATION FOR EXTENSION OF TIME**

18
19 IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff
20 Veronica Padilla ("Plaintiff"), and counsel for Defendant Bank of America, N.A. ("Defendant or
21 Ditech"), that the time for Defendant to respond to Plaintiff's Complaint is extended up to and
22 including December 22, 2023.

23 On October 30, 2023, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with
24 Plaintiff's Complaint on November 1, 2023. The deadline for Defendant to respond to Plaintiff's
25 Complaint is November 22, 2023. The Parties have discussed extending the deadline for Defendant
26 to respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss
27 possible resolution of the matter.
28

1 This is the first request for an extension of time for Defendant to file its responsive pleading.
2 The extension is requested in good faith and is not for purposes of delay or prejudice to any other
3 party.

4 DATED: November 22, 2023

LAW OFFICE OF KEVIN L. HERNANDEZ

6 By: /s/ Kevin L. Hernandez

7 Kevin L. Hernandez, Esq.,

8 Attorney for Plaintiff
9 Veronica Padilla

10 DATED: November 22, 2023

WRIGHT FINLAY & ZAK, LLP


12 By: /s/Ramir M. Hernandez

13 Ramir M. Hernandez
14 Darren T. Brenner

15 Attorneys for Defendant
16 Bank of America, N.A.

17 **IT IS SO ORDERED.**

18 DATED: 11/27/2023

19 

21 DANIEL J. ALBRECHTS

22 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT FINLAY & ZAK, LLP, and that on this 22nd day of November, 2023, I caused to be served a true and correct copy of the foregoing ***JOINT STIPULATION FOR EXTENSION OF TIME FOR BANK OF AMERICA, N.A. TO RESPOND TO PLAINTIFF'S COMPLAINT***, in the following manner:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List:

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/s/ Lisa Cox
An employee of WRIGHT FINLAY & ZAK, LLP